

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
ESPIRE ADS LLC, THE BLU MARKET, INC.,
ex rel. LISA NAVARRO, THE BLU MARKET
LLC, ex rel. LISA NAVARRO, and LISA
NAVARRO individually,

Plaintiffs,

v.

TAPP INFLUENCERS CORP., THE BLU
MARKET, INC., THE BLU MARKET LLC,
STEVEN FORKOSH, BRENNAN KASTNER,
and JUSTIN EMERT,

Defendants

1:21-cv-10623
Hon. John G. Koeltl

AFFIDAVIT IN SUPPORT
OF MOTION

-----X
New Jersey
STATE OF ~~NEW YORK~~

COUNTY OF *Bergen*

Alex Vasquez, being duly sworn, deposes and says:

1. I am a former employee of The Blu Market, Inc. ("Blu Market") and current member of TAPP Market Influencers, LLC ("TAPP").
2. I began with Blu Market in 2013 and was responsible for bringing Lisa Navarro ("Navarro") to the company and introducing her to Steven Forkosh and the field of influencer or affiliate marketing.
3. When she began, Navarro had no relevant affiliate marketing experience. She had some influencer contacts prior to Blu Market but no one that Blu Market had not worked with already. Most of her contacts and introductions were established at Blu Market.
4. Navarro eventually left for a company that she had started, Espire Ads ("Espire"). While I did not join Espire after Navarro left, I did do some consulting for it

and am familiar with its operations.

6. Espire basically copied Blu Market, so much so that I have had people ask if it is the same company.

7. Espire uses the same third party vendor, Tune, as Blu Market for its software and operating system to run the entire company's management and operations.

8. Espire uses the same influencers as Blu Market, all relationships which Navarro established at Blu Market.

9. Most of Espire's operations team had been Blu Market's operations team.

10. My one direct involvement with Espire was when Navarro wanted to remove Erik Radtke, also a former Blu Market employee.

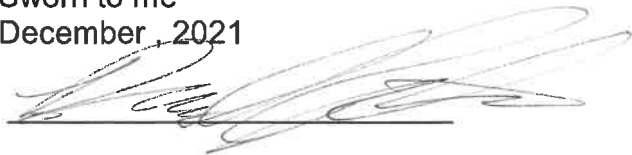
11. She asked if she could appoint me to the Espire Board so I could be her deciding vote for that specific purpose.

12. I agreed and she appointed me. A conference call Board meeting was then held and as predicted, I was the deciding vote to remove Radtke. Her tactic was successful. After that vote, however, I never heard another word from Navarro or Espire as to my "Board membership"; nor was I advised of any other Board meetings.



Alex Vasquez

Sworn to me
December, 2021



DANIEL SERAPHIN
NOTARY PUBLIC OF NEW JERSEY
COMM. NO. 2440898
MY COMMISSION EXPIRES 11/25/2023